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LIBERTY MUTUAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

LIBERTY MUTUAL INSURANCE
COMPANY,

Plaintiff,

vs.

MICHAEL T. BLATT,

Defendant.

Case No. C 06 2022 CW

**WITNESS LIST OF PLAINTIFF
LIBERTY MUTUAL INSURANCE
COMPANY**

Trial: March 10, 2008

Liberty Mutual Insurance Company submits the following list of witnesses
who may be called at the trial of this matter:

1. Mr. Joseph D. Ryan – Mr. Ryan and his firm represented Liberty's named
insured, Schnabel Foundation, in the underlying litigation. He will testify about the
claims made against Schnabel and Mr. Blatt, and he will testify that there were
claims at issue in the underlying litigation that had nothing whatsoever to do with the
wall built by Schnabel.

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LIBERTY MUTUAL'S WITNESS LIST

1 2. Ms. Nancy Ball – Ms. Ball is an employee of Liberty Mutual Insurance
2 Company and she is currently responsible for the current matter. She will testify
3 about the nature and extent of payments made by Liberty Mutual for the defense of
4 the underlying litigation.

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6 Dated: February 28, 2008

KRING & CHUNG, LLP

/s/ J. Christopher Bennington

By: _____

J. Christopher Bennington
Ronald J. Skocytec
Attorneys for Plaintiff
LIBERTY MUTUAL INSURANCE
COMPANY

